

In The Matter Of:)
)
Creation Of A) FCC Docket No. RM-11287
Low Power AM Radio Service)

Page

Introduction
1

Setting Priorities
1

LPAM Voters and LPFM Voters
2

Letting LPAM Voters Speak In Their Own Voice
4

Conclusion
5

UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In The Matter Of:)	
)	
Creation Of A)	FCC Docket No. RM-11287
Low Power AM Radio Service)	

WRITTEN COMMENTS OF
THE AMHERST ALLIANCE

THE AMHERST ALLIANCE of Michigan is a Net-based, nationwide citizens' advocacy group for more open airwaves in general and Low Power Radio in particular. Founded on September 19, 1998, at a meeting in Amherst, Massachusetts, our group was an active advocate for the Low Power FM (LPFM) Radio Service that the Commission established in January of 2000.

THE AMHERST ALLIANCE has also been a longstanding advocate for Low Power Radio on the AM Band. In pursuit of this goal, Amherst has become a party to the August 19, 2005 Petition to establish a Low Power AM (LPAM) Radio Service.

Setting Priorities

The LPAM Petition proposes that eligibility for LPAM licenses should be open to 3 groups who have been largely or completely excluded from the LPFM Radio Service:

- (A) Individual station owners and/or operators
- (B) Newly formed organizations, without “an established record of community service”

And/or

- (C) Small businesses, or others wishing to air commercials

-2-

Recently, the leaders of Amherst decided it would be helpful -- for Amherst, the Commission and perhaps others -- if Amherst Members were asked to prioritize these 3 objectives.

Our electronic referenda asked each Member of Amherst to rank each objective on a scale of 1 to 10. 1 signified feverish opposition, 5 indicated neutrality and 10 communicated all-out support.

The overall results of the voting yielded the following priorities:

- | | |
|--|-----|
| #1. INDIVIDUALS should be eligible for LPAM licenses: | 9.0 |
| #2. NEWCOMERS (whether individuals or organizations) should not be penalized in the competition for LPAM licenses: | 7.9 |
| #3. LPAM stations should be able to air COMMERCIALS: | 6.1 |

LPAM Voters and LPFM Voters

The overall results mask a notable discrepancy between the attitudes of aspiring LPAM broadcasters within Amherst (mostly newcomers to the organization) and the other Members of Amherst (mostly longtime Members, with LPFM as a primary focus).

The LPAM Voters ranked the 3 objectives as follows:

#1. Open LPAM to INDIVIDUALS: 9.5

Amherst Average: 9.0

LPFM Voter Average: 8.6

#2. Open LPAM to COMMERCIALS: 8.3

Amherst Average: 6.1

LPFM Voter Average: 4.4

-3-

#3. Open LPAM to NEWCOMERS: 7.0

Amherst Average: 7.9

LPFM Voters: 8.6

As the Commission can see, there is a high degree of consensus on the principle that opening the new LPAM Radio Service to *individuals*, rather than limiting eligibility to organizations alone, should be Amherst's #1 priority among the 3 objectives.

In addition, on the objective of opening LPAM to *newcomers*:

The actual rankings of priority vary, but the *intensity of support* is fairly similar among LPAM Voters, LPFM Voters and the Amherst Membership as a whole.

On the issue of airing *commercials*, however, there is an obvious difference between the LPAM Voters and the LPFM Voters.

In the case of the LPFM Voters, this difference may result in part from the fact that many of the most commercially oriented individuals within Amherst's *original* Membership dropped out once commercials were excluded from the LPFM Radio Service. Those original Members who have remained within Amherst have tended to accept LPFM's exclusively non-commercial status as a "fact of life", to which they must adapt. Also: Continuing Amherst Members who actually obtained LPFM licenses have studied, and largely copied, the successful use of "donor acknowledgements" by NPR.

However, there also appears to be a true cultural difference between the LPAM Voters and the LPFM Voters. From the start, the LPAM-oriented Members of Amherst have tended to be more individualistic and entrepreneurial than the LPFM-oriented Members. This tendency might be linked to the fact that most of the LPAM-oriented Members have already started up, and aired commercials on, their own Part 15 AM stations. By contrast, Amherst's LPFM-oriented Members are more likely to have worked in radio in one or more institutional settings, including non-commercial settings.

-4-

Letting LPAM Voters Speak In Their Own Voice

Based in part upon the documentation of the differences between Amherst's LPAM-oriented Members and Amherst's LPFM-oriented Members, and based in part upon the emergence of Part 15 AM stations as a key issue in various RM-11287 filings, an agreement was reached to "spin off" a new AMHERST ALLIANCE affiliate. This affiliate, composed of current and former Part 15 AM station

operators who support a new LPAM Radio Service, is named RADIO READY TO GROW (RRTG).

All but one of Amherst's LPAM Voters are current or former Part 15 AM broadcasters -- and the one exception is Amherst's President. She was originally focused on LPFM, but discovered no LPFM frequencies are available in Metro Detroit.

Founded on November 17, 2005, RRTG has already filed Written Comments in Docket RM-11287. In addition, it has become the primary signatory of a new Petition For Rulemaking which seeks a power boost to 1 watt for Part 15 AM stations -- as a supplement to, rather than a substitute for, the new LPAM Radio Service.

The new group is *affiliated* with Amherst, but also free to speak independently. RRTG is chaired by Frank Hansche, General Manager of EAST HILL RADIO in the Seattle suburb of Kent, Washington. The group's mailing address is:

Frank Hansche
Chairman
RADIO READY TO GROW (RRTG)
And
General Manager
EAST HILL RADIO
12607 S.E. 255th Place
Kent, Washington 98030

THE AMHERST ALLIANCE hopes that the background information we have just provided will be helpful to the Commission.

Respectfully submitted,

Stephanie Loveless

President

THE AMHERST ALLIANCE

President

THE MICHIGAN MUSIC IS WORLD CLASS! CAMPAIGN

P.O. Box 20076

Ferndale, Michigan 48220

jamrag@glis.net OR loveless@jamrag.com

URL: www.amherstalliance.net

Dated: November 20, 2005